

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

## **REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed. R.Civ. P. 26(f), a meeting of the parties was held on March 14, 2006 by conference call. Appearing for the plaintiff was Donna C. Crooks. Appearing for the defendant was Patrick R. Norris.

2. Pre-discovery disclosures: The parties have exchanged the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery plan: The parties jointly propose to the Court the following discovery plan:

Discovery needed – Discovery will be necessary both on the issues of the liability of defendant Mike Shad Chrysler for the theft of the plaintiff's identity by the co-defendant (the plaintiff's son (who to date has failed to answer or otherwise defend and against whom is currently pending a Motion for Default)) related to the sale of an automobile and the alleged damages sustained by the plaintiff as a result. The parties foresee the

need for paper discovery, depositions and possibly expert testimony.

Commencement – Discovery shall be commenced so as to be completed by no later than September 1, 2006, with the exception of depositions of experts, being completed within 30 days from the date such expert's report is produced, as set forth below.

Maximum – The maximum number of interrogatories allowed to each shall be 25 and responses or objections shall be due within 30 days after service.

The maximum number of requests for admissions shall be 5 and responses or objections shall be due within 30 days after service.

There will be a maximum number of 10 depositions by the plaintiff and 10 by the defendant. By agreement of the parties, there shall be no time limit on the duration of such depositions.

Experts – Reports of retained experts under Rule 26(a)(2) are due:  
From the plaintiff by no later than September 15, 2006; and  
From the defendant by no later than September 29, 2006.

All supplementations under Rule 26(e) are due within 30 days of the first trial setting.

4. Other items:

The parties do not request a conference with the court before entry of the scheduling order.

The parties request that a pretrial conference be held on or after October 2, 2006.

The cutoff for the Plaintiff to add additional parties and/or amend his pleadings shall be July 14, 2006.

The cutoff for the Defendant to add additional parties and/or amend its pleadings shall be July 21, 2006.

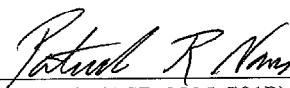
All potentially dispositive motions shall be filed by the date of the pretrial conference.

Settlement cannot be evaluated until conclusion of all depositions, expert or otherwise, and should be properly evaluated by no later than October 19, 2006.

Final lists of witnesses and exhibits shall be due from both plaintiff and defendant 30 days prior to the first trial setting.

Parties shall have 10 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

This cause should be ready for trial by **December 4, 2006** and will take approximately 1 ½ days to try inclusive of striking of a jury.



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